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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
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20 SEP 96 15 42N60258.000883  
NSY LONG BEACH  
SSIC # 5090.3

September 17, 1996

Mr. Gary Simon  
Southwest Division  
Naval Facilities Engineering Command  
Code 1832.SR  
1220 Pacific Highway  
San Diego, CA 92132-5183

**PROPOSED WORKPLAN - SITE CHARACTERIZATION AND ANALYSIS PENETROMETER SYSTEM PROJECT - LONG BEACH NAVAL SHIPYARD, LONG BEACH, CALIFORNIA (File No. 90-76)**

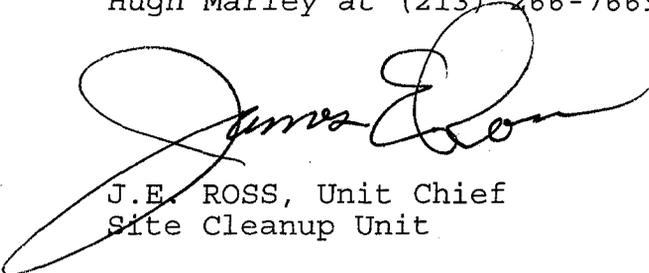
We have received and reviewed the Proposed Workplan for Site Characterization and Analysis Penetrometer System Project at the Long Beach Naval Shipyard, dated September 11, 1996. Our comments are as follows:

- . Note that the soil cleanup levels of 10,000 mg/kg stated in section 1.4 is for TPH as diesel only. The soil cleanup levels for TPH as gasoline is 1,000 mg/kg.
- . Section 2.2.2 should also state that the site is underlain by up to 20 feet of hydraulic fill.
- . Section 2.2.3 should reference the groundwater elevations detailed in the RI document. The depth to groundwater varies significantly from the 8 feet quoted.
- . We are not familiar with the practice of using compressed air to expose the CPT groundwater sampling probe's screen. Of concern is the volatilizing effect of compressed air on a CPT groundwater sampling probe's limited sphere of influence. Please clarify the above.
- . Section 4 is missing the description, and the proposed scope of work for the Building 7 UST site.
- . The workplan indicates that the SCAPS unit will identify and characterize sites with existing and suspected USTs. The SCAPS characterization will then be verified using soil samples. However, when the USTs are then excavated, as planned, more soil samples will be collected, as required by the Fire Department. The workplan should be modified in order to eliminate any redundant soil sampling and analysis.

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The workplan must include, or reference an approved Health and Safety Plan.

If you have any questions regarding this matter, please contact Hugh Marley at (213) 266-7669.



J.E. ROSS, Unit Chief  
Site Cleanup Unit

cc: Alvaro Gutterez, Department of Toxic Substances Control  
CDR Anthony Didomenico, Naval Shipyard Long Beach  
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Alan Lee, Navy Southwest Division, San Diego  
Ms. Anna Ulaszewski, Naval Shipyard long Beach